

RECEIVED

JAN 21 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donald G. McCarthy
1440 Via Lima
Fallbrook, CA 92028
January 15, 1993

DOCKET FILE COPY ORIGINAL

92-235

The Honorable Sir
Consumer Assistance & Small Bus Ofc
Fed Communications Commission
1919 M St NW
Rm 254
Washington, DC 20554

Dear Consumer Assistance & SBO Sir:

It has come to my attention that the FCC has issued a notice of Proposed Rule Making (NPRM-PR Docket 92-235). This document will have a profound effect on the model frequency use. Developed by the Mobil Land Service, the proposal creates a massive frequency restructuring- the first in 60 years. Even though it effects part 88 of the code of federal regulation, it also effects part 95 where the RC frequency use lives.

The restructuring inserts two new frequencies between those presently assigned for modeling use and commercial users. That means that we could have a user, HIGHER IN POWER, transmitting only 2.5 khz away from many of our 72mhz and 75mhz frequencies.

What we need is to have this bill killed, it is infringing in on the frequencies we have fought for and used for over 20 years. Any help in the matter will be greatly received by all modelers throughout the UNITED STATES and the international sector of model flying.

Sincerely yours,

Donald G. McCarthy

Donald G. McCarthy

No. of Copies rec'd 19
List A B C D E

Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED

JAN 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1/18/93

DOCKET FILE COPY ORIGINAL
RECEIVED

JAN 21 1993

FCC MAIL ROOM

Urgent: Serious problem with PR Docket 92-235.

Dear Sirs:

Please help me! My hobby is the construction and operation of radio controlled model airplanes. I have been in this hobby for many years and have a considerable investment in it. It is a wonderful hobby for young and old. Also, I have many friends in this hobby.

I am very concerned about the proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is **PR Docket 92-235**. If adopted, the new rules will absolutely cause radio interference on the majority of frequencies currently assigned for RC model aircraft use. Safety is very important in this hobby.

Our RC frequencies are in the 72 - 76 MHz band. We share this band with the private land mobile dispatch operations. However, now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging this band. The mobile frequencies will be separated by 5 KHz but they will bracket the RC frequencies by only 2.5 KHz. This will cause interference on the RC channels. In addition **the technical specifications for the new mobile equipment allows a frequency tolerance which could place their signal directly on an RC channel.**

Can you imagine all the RC airplanes, each costing several hundred dollars or more, that will be crashing to the ground because someone uses a "mobile" telephone in the vicinity. We modelers have controls and rules in place to assure the safety of the operators and bystanders and also the protection of surrounding property. But there will be no protection against these new frequencies because they are "mobile" and we would never know where they are.

The frequency changes are proposed by the FCC Land Mobile Service. The FCC has issued a Notice of Proposed Rule Making (**NPRM - PR Docket 92-235**)

All over the country there are organized events and contests where hundreds of operators participate. Spectators often number in the thousands at these events. This hobby provides many hours of enjoyment to hundreds of thousands of people like myself and my family. *Please help keep model aviation safe.*

The FCC must not be allowed to carry out its proposals for the 72 - 76 MHz band.

Sincerely

Richard M Verellen
Huntington In.

92-235

DOCKET FILE COPY ORIGINAL

January 19, 1993

Rockville, MD

RECEIVED

RECEIVED

JAN 21 1993

JAN 22 1993

Federal Communications Commission
1919 M St., NW
Washington, DC

Dear Sirs,

FCC MAIL ROOM

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I urge the Federal Communications Commission not to adopt certain provisions of Proposed Rule Making (NPRM - PR Docket 92-235). My specific objections are to those parts that would allow mobile use of frequencies within the 72 and 75 MHz bands, and technical specifications that allow excessive frequency tolerances within those bands.

I am an active member of a Radio Control model airplane club and derive much pleasure in building and flying model airplanes, as do other tens of thousands like myself. The presently FCC assigned and approved radio control frequencies are already "bothered" to some degree by (FCC allowed) higher powered "pagers" and commercial users. To approve the new rule, the FCC would be bowing to additional commercial use of frequencies already assigned to modeling and render most of "our" frequencies unusable.

The above notwithstanding, the proposed rule would allow a frequency tolerance which could place the radio signals of these commercial users directly on top of ours. There would be no warning of this happening at our presently assigned flying site that is contained within public park land. Many of our models weigh in excess of 15 pounds and are capable of flying at speeds greater than 100 MPH. Unknown and sudden radio interference could cause IMMEDIATE DANGER to personnel or property over which the operator would have no control whatsoever!!!

To approve certain provisions of PR Docket 92-235, the FCC would itself be creating a potentially harmful situation - not only here in suburban Maryland, but all over the country!

Sincerely,
Donald Thomson
Donald Thomson
319 Bradley Ave.
Rockville, MD 20851

cc:
Technical Director,
Academy of Model Aeronautics



INTERNATIONAL HOBBYCRAFT CO.

RECEIVED
FAX (708) 564-9945

JAN 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1955 SHERMER ROAD, SUITE 150
NORTHBROOK, ILLINOIS 60062-5319
U.S.A.

RECEIVED

TELEPHONE
AREA CODE (708) 564-9945

18 January, 1993

JAN 21 1993

FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET N.W.
WASHINGTON, D.C. 20554

FCC MAIL ROOM

RE: NPRM PR Docket 92-235

Dear Sirs,

Our firm is heavily involved in the export of U.S. produced hobby goods, primarily radio control hobby items, into foreign markets. We wish to register our strongest concerns with you about the pending consideration of PR Docket 92-235 by the FCC. If adopted, these new rules will have a major negative impact on the U.S. hobby industry as a whole and would be disastrous to certain U.S. manufacturers in particular.

Further, if adopted, these new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and associated liability for controlling model airplanes.

As a modeler of many years myself, I have a had a great deal of experience in the actual use of radio control equipment. I can assure you that decreasing the amount of usable frequencies - the net effect of this proposed ruling - will greatly increase the possibility of congestion on the remaining frequencies. Despite the great lengths that modelers go to to maintain a safe flying environment, such frequency congestion will lead to accidents.

Our model aircraft represent many hours of intense labor and care. To be asked to now risk these efforts in a government-induced attempt to cater to the needs of some businesses, is at best unfair. Modelers who engage in our hobby come from all walks of life and represent a true cross-section of America. We need competent, well-conceived legislation to preserve and even encourage the further development of this hobby, as it represents the interests of thousands and thousands of people.

Please catagorically deny the consideration of NPRM PR Docket 92-235.

Respectfully,

INTERNATIONAL HOBBYCRAFT CO., INC.

Scott Christensen
Vice President



RECEIVED

JAN 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FCC
1919 M St NW
Washington D.C. 20554

DOCKET FILE COPY ORIGINAL
RECEIVED

JAN 21 1993

FCC MAIL ROOM

Subject: NPRM PR Docket 92-235

Dear Sirs:

The referenced NPRM has recently been issued and will profoundly and adversely affect many thousands of hobbyists who have invested many thousands of dollars and years of efforts to enjoy operating radio controlled model aircraft, boats and cars. I respectfully ask your Commission to consider the effect of this regulation on the hobby industry.

You are proposing addition of a number of high power mobile transmitting frequencies in a band that has been set aside specifically for model operations. A band that modelers have worked responsibly for over a good number of years to justify. These new proposed frequency allotments are within 2.5 kHz of many of the frequencies allocated for model usage and equipment that just within the last year or so had bandwidth tightened to 20kHz from 40 kHz so we could have additional channels available without asking for additional bandwidth in a crowded radio spectrum. Each modeler was forced to spend from \$100 to many hundreds of dollars to accomodate this change.

Legal operation of the proposed new transmitters anywhere near our low powered radios could swamp our signal and cause loss of control of an aircraft weighing up to 55 lbs and moving at up to 200 mph. Obviously no responsible modeler would attempt to fly at all if his model, perhaps costing up to several thousand dollars and hundreds of man hours to build, would be at risk or would pose a risk to other people or property. The hobby they have enjoyed and worked for so long would effectively be wiped out with this one regulation change!

A multi million, well over a billion, dollar hobby industry and the jobs it generates will be wiped out. Many thousands of us, the Academy of Model Aeronautics has over two hundred thousand members alone and my local flying club has close to two hundred members, will be forced out of an educational and enjoyable hobby. Many thousands of young people will be denied the chance to learn first hand the engineering and aeronautical skills that can spark an interest leading to a useful career.

I call on you again to review and modify this NPRM to allow our hobby to continue.

Sincerely,



Ron Peterka
25106 Oakana Rd
Ramona, CA 92065

HOURS BY APPOINTMENT
PH. & FAX (817) 599-7131

RECEIVED

JAN 21 1993

H. Sanford Frank, Ph.D.
LICENSED PSYCHOLOGIST

FCC MAIL ROOM

1-16-93

105 NORTH BRAZOS
WEATHERFORD, TEXAS 76086

Commissioner
F.C.C. - DC.

RE: FCC Docket
NIPRM-PR-92-235

I can only believe that
a government agency only
would be so stupid to
enact such a program for the
72 Mc. Band —
typical Bureaucratic
Idocs — Dr. Frank
(over)

92-235

RECEIVED

JAN 22 1993

DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1. The increased danger of interference and crashes of our models. Remind the **FCC** that some of our models weigh more than 10 pounds and travel in excess of 100 MPH.

2. The staggering cost to individuals and the industry to redesign and acquire new radio equipment.

3. That hundreds of thousands, perhaps over a million RC hobbyists will be affected.

Don't Be Typically
Bureaucratically
Stupid!



UNITED MODEL DISTRIBUTORS, INC.

RECEIVED

JAN 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL

RECEIVED

JAN 21 1993

FCC MAIL ROOM

January 19, 1993

Federal Communications Commission
1919 M St., N.W.
Washington, D.C. 20554

REF: PR Docket 92-235

Gentlemen:

My company is engaged in the Distribution of Hobby Products on a national basis. We employ over 100 people and actively sell over 4,000 hobby shops in the U.S. A large part of our business is concerned with Radio Control products.

I am very concerned about proposed rules that are currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies currently assigned for model use and increase the risk of accidents and attendant liability for controlling model airplanes.

Our radio control frequencies are in the 72 - 76 MHz band. This band is primarily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from the land mobile frequencies that we have been able to share the band without either use interfering with the other.

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. I am told that of the 50 frequencies that are presently available for radio control of model airplanes, only 19 frequencies will be left if these new rules are adopted.

When our modelers fly model airplanes under radio control, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many of our safety precautions involve the careful coordination and use of the radio control frequencies. If the number of usable frequencies is diminished as proposed by the FCC, the remaining frequencies will become congested and the margin of safety will be greatly decreased.

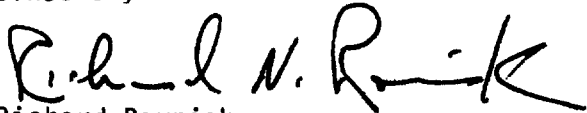
Federal Communications Commission
REF: PR Docket 92-235
January 19, 1993
Page 2

Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive to build; but more to the point, they are capable of causing property damage, serious injury, or even death if radio interference causes the operator to lose control of the craft. We often fly our models at organized events and contests where hundreds of operators participate. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

It is not wise of the FCC to seek to improve the operating conditions of land mobile radio users at the expense of radio control modelers. The FCC may not think we are as important as business users of radios, but we have a considerable investment in our company and in our employees. The hobby provides many hours of enjoyment to thousands of people and contributes to the advancement and development of the commercial aviation industry. It also employs thousands.

I urge you to not cut our 72 - 76 MHz bands as outlined in PR Docket 92-235.

Sincerely

A handwritten signature in black ink, appearing to read "Richard N. Rovnick". The signature is stylized with a large, sweeping "R" and a long, horizontal stroke at the end.

Richard Rovnick
President

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RECEIVED

JAN 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

DOCKET FILE COPY ORIGINAL
RECEIVED

JAN 21 1993

FCC MAIL ROOM

Dear Sirs:

It has recently come to my attention that the Federal Communications Commission (FCC) is considering an action that will severely limit and potentially eliminate a very important hobby of mine, radio controlled (R/C) model airplanes, helicopters, cars and boats.

Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of your rules with a new Part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane or helicopter could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 63 years. I own 8 radios and 6 model airplanes, helicopters, cars and boats. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,

Robert J. Klubertanz

Robert J. Klubertanz
616 Alpine Lane
Holmen, WI 54636

MY ORIGINAL "CITIZENS BAND

PERMIT" FOR OPERATING RADIO CONTROLLED
MODELS WAS NUMBER 18W 0191. IT WAS
SUPERSEDED BY CALL SIGN KAX 4221 ON
30 JULY 1968

RECEIVED

JAN 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

James R. Miller
1176 Overlook Drive
Fairborn, Ohio 45324
18 January, 1993

DOCKET FILE COPY
RECEIVED

JAN 21 1993

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

FCC MAIL ROOM

Dear Sirs:

It Has recently come to my attention that the Federal Communication Commission (FCC) is considering an action that will severely limit and potentially eliminate a very important hobby of mine, radio controlled (R/C) model airplanes.

Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of your rules with a new part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 Mhz band and 10 of the 30 frequencies on the 75 Mhz band now used by hobbyists. In fact, More channels will likely be affected.

This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 15 years. I own 12 radios and 9 model airplanes. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 72 Mhz and 75 Mhz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,

James R. Miller

RECEIVED

JAN 22 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

THE HOBBY SHOP
HERITAGE PARK
10 SUMMIT DRIVE WEST
WIMBERLEY, TEXAS 78676

DOCKET FILE COPY ORIGINAL
RECEIVED

JAN 21 1993

FCC MAIL ROOM

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

I am a hobby retailer who sells many radios, radio-controlled models, and related products in my store. In addition, I sell train products, plastic model kits and other related hobby products.

It has recently come to my attention that the Federal Communications Commission (FCC) is considering an action that has the potential to destroy my business and that of thousands of other retailers nationwide like me. The proceeding is PR Docket 92-235.

Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of your rules with a new Part 88. Part 90 allows for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on 72 MHz band and 10 of the 30 frequencies on 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

If adopted the new rule will greatly reduce the usability of frequencies currently assigned for R/C model use and increase the risk of accidents and attendant liability. It will create a significant safety risk and severely damage a billion dollar industry. Loss of R/C sales will hamper my ability to stay in business to sell other hobby items as well.

I urge you to reconsider this action. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz frequencies available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,



RECEIVED

[JAN 22 1993]

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MR. & MRS. GORDON SMITH
385 PASO ROBLES DR.
SANTA BARBARA, CA 93108
805 969-0035

DOCKET FILE COPY ORIGINAL
RECEIVED

JAN 21 1993

FCC MAIL ROOM

January 12, 1993

Federal Communications Commission
1919 M st., N W
Washington, DC 20515

Subject: FCC notice NPRM PR docket 92-235

We would appreciate your attention to the following: Due to the subject Proposed Rule, we and about 500,000 other Americans may see the loss of businesses, jobs and our life-long hobby. We are deeply involved in designing, building and flying Radio Controlled Miniature Aircraft. We also own Strand Products, Inc. in Santa Barbara that makes a line of accessories for this activity.

It is our understanding that the Rule being proposed on the subject docket will severely impact, in fact virtually eliminate, the flying of Radio-Controlled Model Aircraft in the U S A! While the proposal is specifically addressed to another area of the Code of Federal Regulations, it has a possibly unforeseen effect on the R/C model planes, cars and boats, due to it's effect on Part 95 of the Code.

To operate safely, our R/C (Remote Control) aircraft must have a secure, specific frequency for each plane being flown. About 1988, the FCC and the R/C hobby-industry worked out and implemented a plan whereby we have shared use with pagers and other voice communicators on some 50 of the 72 and 75 mhz bands. Our model frequencies are spaced at 0.020 mhz apart. The other users are in between ours, 0.010 mhz away from the model frequencies on either side. To achieve this close spacing while maintaining security of signal took 3 years, much effort to educate all the 500,000-plus modelers in the US, and millions of dollars to refit and replace the hundreds of thousands of transmitters and receivers that are now in use.

The proposed rule change would allow additional MOBILE USERS at ONE FOURTH (0.0025 MHZ) of the present spacing! Also, these users would be allowed higher signal power than the models. Since we just recently managed to reconstruct our national frequency scheme to the 0.010 mhz spacing, we know that technology does not exist that will allow safe operation at the proposed spacing and power.

Continued on p.2

FCC cont'd.

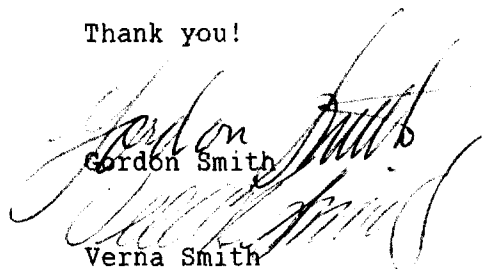

When we say "Safe Operation" we are concerned about aircraft weighing up to 55 pounds that may travel at 100 plus MPH going out of control and crashing into people, cars, buses, houses or whatever. If my R/C plane is 200 feet above the ground, a quarter mile away in the sky, and one of these new mobile users keys his transmitter, my plane will go totally out of control. I will have no possible way of keeping the plane airborne. Gravity and natural forces will cause a swift and destructive crash within seconds.

Our National organization, The Academy of Model Aeronautics, is very much involved in this alert situation. We are sure that you will hear from the AMA in the near future. Time is of the essence, as the period for comments on the Proposed Rule runs out on February 26, 1993.

Please, pay attention to the AMA when they come to you. Turn down the proposed rule as it stands now, or amend it to preserve the frequency spacings as they are now. Please do not allow any more users in between the present frequencies.

We see this as essential to the survival of a great and wide-spread hobby and industry. Flying of model aircraft is the bedrock of America's future as leader of the world-wide aviation community. Virtually all our present aviation leaders became involved as kids through model aircraft activities.

Thank you!


Gordon Smith

Verna Smith

cc AMA, Sen. Feinstein, Sen. Boxer, Rep. Huffington.

DOCKET FILE COPY ORIGINAL

RECEIVED

January 15, 1993

JAN 21 1993

FEDERAL COMMUNICATIONS COMMISSION
1919 M St. N.W.
Washington, DC. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

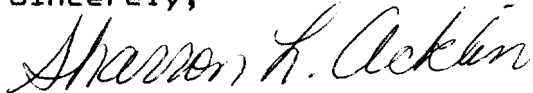
RE; NPRM PR Docket 92-235

Dear FCC,

The FCC is proposing a change in the rules that apply to Radio Controlled Model Aircraft. These changes will do irreversible harm to the hobby. Existing equipment will become dangerous to use and prohibitively expensive to replace. Our hobby has just gone through a major upgrade of equipment in 1991 to comply with new rules and can not survive another.

Please do not support these changes.

Sincerely,



Sharron L. Acklin

No. of Copies rec'd 0
List A B C D E